

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

UNITED STATES OF AMERICA)

v.) NO. 2:92-CR-82-KOB-JHE

RALPH WAYNE THOMAS)

**GOVERNMENT’S RESPONSE TO THOMAS’S MOTION
FOR COMPASSIONATE RELEASE UNDER 18 U.S.C. § 3582(c)(1)(A)**

COMES NOW the United States of America, by and through its counsel,
Prim F. Escalona, United States Attorney for the Northern District of Alabama, and
William G. Simpson, Assistant United States Attorney, and, in response to
Thomas’s Motion for Compassionate Release [Doc. 67], states as follows:

1. The United States does not oppose the relief being sought by defendant
Thomas in his motion.

2. However, according to information received on November 9, 2020, from
Shane McCullough, legal counsel at FMC Springfield, Thomas is currently
suffering from COVID-19 (“...it appears Mr. Thomas is struggling right now with
active COVID.”). Thus, the Court may wish to delay Thomas’s release for an

appropriate period of time, as an order granting *immediate* release could prove to be both problematic to the public and extremely detrimental to Thomas's health.

Respectfully submitted on this the 10th day of November, 2020.

PRIM F. ESCALONA
United States Attorney

/s/ Electronic Signature

WILLIAM G. SIMPSON
Assistant United States Attorney

CERTIFICATE OF SERVICE

This is to certify that the foregoing has been electronically filed with the Clerk of Court, Northern District of Alabama, on this the 10th day of November, 2020, using the CM/ECF filing system, which will send notification of the same to counsel of record.

/s/ Electronic Signature

WILLIAM G. SIMPSON
Assistant United States Attorney